

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

BLACKWATER SECURITY CONSULTING,
LLC, a Delaware Limited Liability Company;
and BLACKWATER LODGE AND
TRAINING CENTER, INC., a Delaware
Corporation,

Plaintiffs,

v.

WESTCHESTER SURPLUS LINES
INSURANCE COMPANY, a Georgia
Corporation; EVANSTON INSURANCE
COMPANY, an Illinois Corporation;
FIDELITY AND CASUALTY COMPANY
OF NEW YORK, a South Carolina
Corporation; and LIBERTY INSURANCE
UNDERWRITERS, a Massachusetts
Corporation,

Defendants.

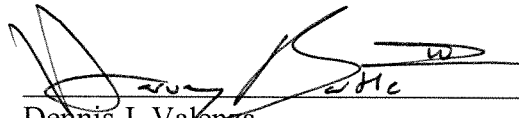
Civil Action No. 05-6020 (PBT)

**CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

Pursuant to Local Rule 7.1 of the United States District Court for the Eastern District of Pennsylvania, Plaintiffs Blackwater Security Consulting, LLC, and Blackwater Lodge and Training Center, Inc. (collectively "Blackwater"), by undersigned counsel, hereby respectfully request a nine day extension, from May 3, 2006, up to and including May 12, 2006, to respond to the motion of Defendants Evanston Insurance Company, Fidelity & Casualty Company of New York, and Liberty International Underwriters, Inc. (collectively "Defendants") to transfer the venue of this action to the United States District Court for the Eastern District of North Carolina

pursuant to 28 U.S.C. § 1404(a).¹ Blackwater makes this request because its counsel, as the result of prior obligations, has not had the opportunity to consider and to fully respond to Defendants' motion. Counsel for all of the Defendants have consented to this motion. A proposed Order is attached.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Dennis J. Valenza', is written over a horizontal line.

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Date: May 1, 2006

¹ Defendant Westchester Surplus Lines Insurance Company consented to the motion to transfer venue but did not join in the motion.